

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**

2 Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
3 Sara Jenkins (CA Bar No. 230097)  
sarajenkins@quinnemanuel.com  
4 555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
5 Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
Teuta Fani (admitted *pro hac vice*)  
teutafani@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

7 Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
8 Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
9 Crystal Nix-Hines (Bar No. 326971)  
crystalnixhines@quinnemanuel.com  
10 Marie Hayrapetian (CA Bar No. 315797)  
mariehayrapetian@quinnemanuel.com  
11 865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
12 Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)  
josefansorge@quinnemanuel.com  
Xi (“Tracy”) Gao (CA Bar No. 326266)  
tracygao@quinnemanuel.com  
Carl Spilly (admitted *pro hac vice*)  
carlspilly@quinnemanuel.com  
1300 I Street NW, Suite 900  
Washington D.C., 20005  
Telephone: (202) 538-8000  
Facsimile: (202) 538-8100

14 Jomaire Crawford (admitted *pro hac vice*)  
15 jomairecrawford@quinnemanuel.com  
16 51 Madison Avenue, 22nd Floor  
New York, NY 10010  
17 Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

18 Jonathan Tse (CA Bar No. 305468)  
19 jonathantse@quinnemanuel.com  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

20 *Counsel for Defendant Google LLC*

21 **UNITED STATES DISTRICT COURT**

22 **NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

23 CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of themselves and  
all others similarly situated,

24 Plaintiffs,

25 v.

26 GOOGLE LLC,

27 Defendant.

28 Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARIE  
HAYRAPETIAN IN SUPPORT OF  
GOOGLE LLC'S ADMINISTRATIVE  
MOTION TO SEAL PORTIONS OF THE  
APRIL 21, 2022 HEARING TRANSCRIPT**

Judge: Hon. Susan van Keulen, USMJ

Case No. 4:20-cv-03664-YGR-SVK

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
 3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.  
 4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
 5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google  
 7 LLC’s Administrative Motion To Seal Portions Of The April 21, 2022 Hearing Transcript. In  
 8 making this request, Google has carefully considered the relevant legal standard and policy  
 9 considerations outlined in Civil Local Rule 79-5. Google makes this request with the good faith  
 10 belief that certain information sought to be sealed consists of Google’s confidential information and  
 11 that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the April 21,  
 13 2022 Hearing Transcript (“Transcript”).

14 4. The information requested to be sealed contains Google’s non-public, sensitive  
 15 confidential and proprietary business information that could affect Google’s competitive standing  
 16 and may expose Google to increased security risks if publicly disclosed, including details related to  
 17 Google’s internal projects, internal identifiers, data signals and logs, and their proprietary  
 18 functionalities, as well as internal metrics, which Google maintains as confidential in the ordinary  
 19 course of its business and is not generally known to the public or Google’s competitors.

20 5. Such highly confidential information reveals Google’s internal strategy and systems  
 21 regarding various important products and nonpublic investigations thereto and falls within the  
 22 protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. The redacted  
 23 portions also contain, summarize or reflect material designated, Confidential or Highly Confidential  
 24 – Attorneys’ Eyes Only Pursuant to Stipulated Protective Order.

25 6. Public disclosure of such highly confidential information could affect Google’s  
 26 competitive standing as competitors may alter their system designs and practices relating to  
 27 competing products, time strategic litigation, focus their patent prosecution strategies, or otherwise  
 28 unfairly compete with Google. It may also place Google at an increased risk of cybersecurity threats,

1 as third parties may seek to use the information to compromise Google's internal systems and  
2 operations.

3       7. For these reasons, Google respectfully requests that the Court order the identified  
4 portions of Transcript to be sealed.

5       I declare under penalty of perjury of the laws of the United States that the foregoing is true  
6 and correct. Executed in Los Angeles, California on June 27, 2022.

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8 DATED: June 27, 2022

QUINN EMANUEL URQUHART &  
9 SULLIVAN, LLP

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By /s/ Marie Hayrapetian  
Marie Hayrapetian  
13 Attorney for Defendant

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